

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Weifang Tengyi Jewelry Trading Co., Ltd.)	
)	
Plaintiff,)	Case No. 21-cv-551
)	
v.)	Judge Matthew F. Kennelly
)	
The Partnerships And Unincorporated Associations Identified On Schedule “A”)	Magistrate Judge Susan E. Cox
)	
Defendants.)	

**AGREED MOTION FOR ENTRY OF
CONSENT JUDGMENT AND PERMANENT INJUNCTION**

Plaintiff Weifang Tengyi Jewelry Trading Co., Ltd. (“Plaintiff” or “Weifang”) and Defendants No. 118: SemanticSearchLtd, and No. 16: dealsdirect-ca, having reached an agreement that would resolve all of the claims at issue in the above-captioned litigation, jointly move for the entry of the proposed stipulated permanent injunction and order of dismissal attached as Exhibit One. Defendants SemanticSearchLtd and dealsdirect-ca have indicated their consent attached as Exhibit Two and Three, respectively.

Weifang filed this action on January 30, 2021, seeking relief in the form of permanent injunction and damages relating to Defendants’ activities that constitute trademark infringement and counterfeiting (15 U.S.C. § 1114), [Id. at ¶¶ 38-44] false designation of origin (15 U.S.C. § 1125(a)), [Id. at ¶¶ 45-48] and violation of the Illinois Uniform Deceptive Trade Practices Act. (815 ILCS § 510, et. seq.) [Id. at ¶¶ 49-52]. [Doc. 1] On April 26, 2021, Plaintiff moved the

Court for entry of a temporary restraining order, including a temporary injunction and an asset restraining order, and for an order permitting Electronic Service of Process Pursuant to Fed. R. Civ. P. 4(f)(3). [Docs. 21, 22] The Court granted Plaintiff's motions on April 30, 2021. [Docs. 23, 24] On May 24, 2021, the Court converted the temporary restraining order into a preliminary injunction. [Doc. 30]

The parties have been engaged in extensive and productive negotiations, and have now reached an agreement to settle their dispute. Entry of the proposed stipulated permanent injunction and order of dismissal will resolve this litigation in its entirety, conserve judicial resources, and avoid the expense, uncertainty, inconvenience, and other burdens of litigation.

For all of these reasons, the parties respectfully request that the Court enter the attached proposed order.

Respectfully submitted this 13th day of October 2021,

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